

Exhibit B

Smith, Samantha E.

From: Pritsker, Gabrielle E. <gpritsker@jonesday.com>
Sent: Tuesday, January 14, 2020 5:22 PM
To: Smith, Samantha E.; Cottreau, Steven T.; Frederick Goetz;
juanmorillo@quinnemanuel.com; Peter Salerno; Amy Rothstein; Omar Mohammedi, Esq.
(OMohammedi@otmlaw.com); Aisha Bemby; Waleed Nassar; DeGenaro, Stephen M.;
Marshall, C. Kevin
Cc: Goldman, Jerry S.; Strong, Bruce
Subject: RE: Consent Request re. Estate of John P. O'Neill Sr., et al v. al Baraka Investment &
Development Corp., et al.

EXTERNAL SENDER

Samantha,

Counsel for MWL/IIRO also do not oppose the addition of John F. O'Neill as a class representative and also reserve the right to object to future additional class representatives unless given a full and fair opportunity to pursue class discovery related to any future class representatives.

Best,
Gabby

Gabrielle Pritsker
Associate
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From: Pritsker, Gabrielle E.
Sent: Tuesday, January 14, 2020 5:01 PM
To: 'Smith, Samantha E.' <ssmith@andersonkill.com>; Cottreau, Steven T. <scottreau@jonesday.com>; Frederick Goetz <FGoetz@goetzeckland.com>; juanmorillo@quinnemanuel.com; Peter Salerno <peter.salerno.law@gmail.com>; Amy Rothstein <amyrothsteinlaw@gmail.com>; Omar Mohammedi, Esq. (OMohammedi@otmlaw.com) <OMohammedi@otmlaw.com>; Aisha Bemby <Aisha.Bemby@lbkmlaw.com>; Waleed Nassar <Waleed.Nassar@lbkmlaw.com>; DeGenaro, Stephen M. <sdegenaro@jonesday.com>; Marshall, C. Kevin <ckmarshall@jonesday.com>
Cc: Goldman, Jerry S. <Jgoldman@andersonkill.com>; Strong, Bruce <Bstrong@andersonkill.com>
Subject: RE: Consent Request re. Estate of John P. O'Neill Sr., et al v. al Baraka Investment & Development Corp., et al.

Samantha,

On behalf of counsel for DIB, Yassin Kadi, and WAMY, we do not oppose the addition of John F. O'Neill as a class representative. We are still waiting to hear from IIRO/MWL counsel whom we understand is traveling. We will follow up as soon as we hear from them.

We reserve the right to object to future additional class representative unless we are given a full and fair opportunity to pursue class discovery related to any future class representatives.

Best,

Gabrielle Pritsker
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From: Smith, Samantha E. <ssmith@andersonkill.com>

Sent: Monday, January 13, 2020 6:33 PM

To: Cottreau, Steven T. <scottreau@jonesday.com>; Pritsker, Gabrielle E. <gpritsker@jonesday.com>; Frederick Goetz <FGoetz@goetzeckland.com>; juanmorillo@quinnemanuel.com; Peter Salerno <peter.salerno.law@gmail.com>; Amy Rothstein <amyrothsteinlaw@gmail.com>; Omar Mohammedi, Esq. (OMohammedi@otmlaw.com) <OMohammedi@otmlaw.com>; Aisha Bemby <Aisha.Bemby@lbkmlaw.com>; Waleed Nassar <Waleed.Nassar@lbkmlaw.com>

Cc: Goldman, Jerry S. <jgoldman@andersonkill.com>; Strong, Bruce <Bstrong@andersonkill.com>

Subject: Consent Request re. Estate of John P. O'Neill Sr., et al v. al Baraka Investment & Development Corp., et al.

Counsel,

I am an associate at Anderson Kill, P.C., and one of the attorneys of record in the O'Neill litigations.

Pursuant to FRCP Rule 15(a)(2), Plaintiffs seek Defendants written consent to amend their complaint to add the Estate of John F. O'Neill, the late father of John P. O'Neill, Sr. as a party and class representative. In October 2019, we informed counsel that plaintiffs may seek to add this estate as a party to the case. In anticipation of this amendment, on October 24, 2019, Defendants sent Interrogatory Requests to the Estate of John F. O'Neill. That same day, the Estate of John F. O'Neill responded to the Interrogatory Requests. On October 29, 2019, Defendants deposed the personal representative of John F. O'Neill's estate.

So that Plaintiffs know your position as to the proposed amendment in order to include it in the upcoming motion papers, please provide your position no later than 5:00PM on Tuesday, January 14, 2020.

Samantha



Samantha E. Smith

Attorney

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[Biography](#)

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